### United States District Court Southern District of New York

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

### PLAINTIFF'S RESPONSE IN OPPOSITION TO DEFENDANT'S MOTION TO EXCLUDE THE "BLACK BOOK"

Sigrid McCawley BOIES SCHILLER FLEXNER LLP 401 E. Las Olas Blvd., Suite 1200 Ft. Lauderdale, FL 33301 (954) 356-0011

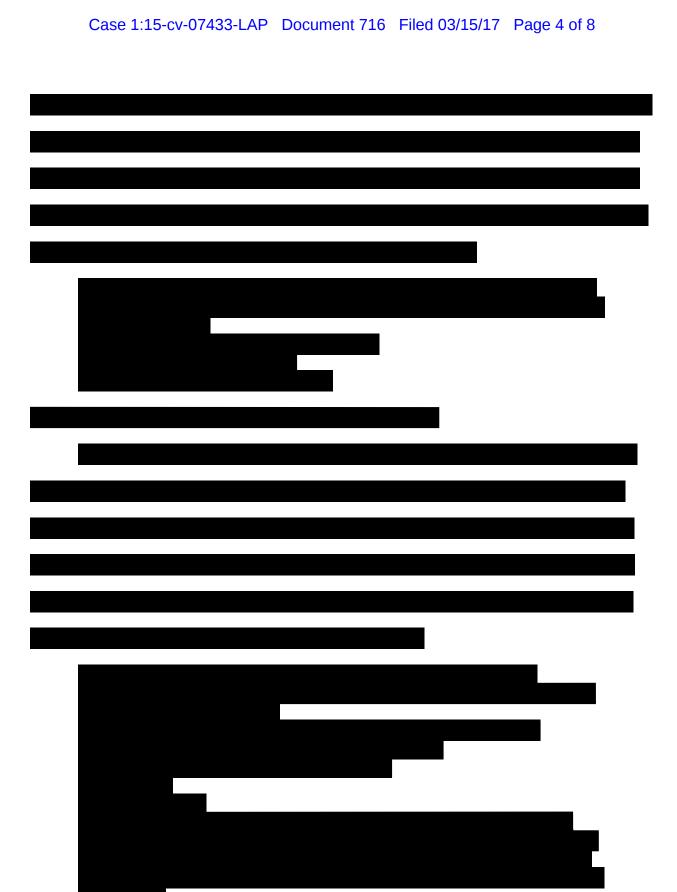
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Plaintiff, Virginia Giuffre, by and through her undersigned counsel, hereby files this response in opposition to Defendant's motion *in limine* (DE 679).

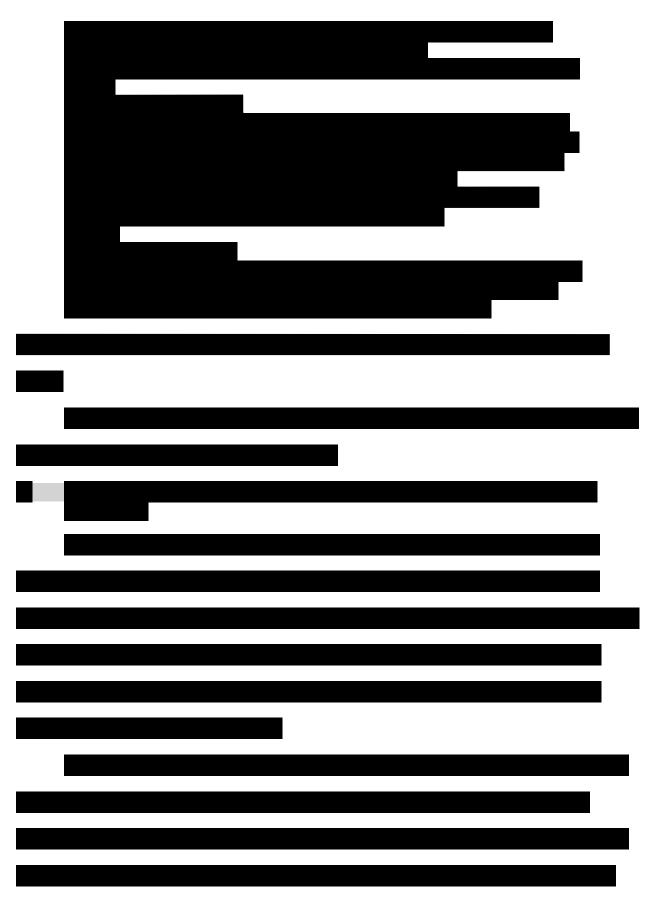
### PRELIMINARY STATEMENT

On February 6, 2017, the Court requested a hearing on the admissibility of the "black book," setting oral argument for this coming Thursday, March 16. Ms. Giuffre and Defendant each filed competing motions *in limine* on the issue on March 3. In the interest of brevity before the Court, Ms. Giuffre adopts all of the facts and arguments from Plaintiff's Motion in Limine to Admit the "Black Book" as Evidence at Trial (DE 683), and incorporates them by reference.

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## **CONCLUSION**

For all the foregoing reasons, the Court should deny Defendant's motion in limine, and

grant Ms. Giuffre's motion to admit the black book at trial.

Dated: March 15, 2017

Respectfully Submitted,

BOIES SCHILLER FLEXNER LLP

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<sup>&</sup>lt;sup>1</sup> This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah for this private representation.

#### **CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on March 15, 2017, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served this day on the individuals identified below via transmission of Notices of Electronic Filing generated by CM/ECF.

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> /s/ Sigrid McCawley Sigrid McCawley, Esq.